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ORIGINAL FEDERAL COMMUNICATIONS COMMISSION DE 200554 13 2000 SPICE OF THE SECRETARY

In the Matter of)

Petitions for Emergency Relief CC Docket No. 95-1552 Regarding Release of the 855 Toll Free Code) File No. NSD-L-00-249

COMMENTS OF TOLL FREE NUMBER COALITION

The Toll Free Number Coalition ("TFNC"), by its attorneys, hereby submits comments in response to the Commission's request for views on issues raised by recent filings as they relate to the release of the 855 toll-free code. For the reasons set forth below. TFNC reiterates its concern that the administration of toll free number releases by the SMS/800 Management Team ("SMT") and Database Management Services, Inc. ("DSMI") (collectively, "SMT/DSMI") violates the Commission's rules and policies, as well as the terms and conditions of SMT's filed tariff. The continued failure of SMT and DSMI to acknowledge, much less rectify, long-standing flaws in their number allocation processes should not be countenanced. TFNC accordingly reiterates its request that the Commission defer the release of the 855 toll free service code until such time as SMT/DSMI has demonstrated to the satisfaction of the Commission that it has adequately rectified the problems which marred its previous rollouts, and that this new allocation will be administered in a fair, orderly and non-discriminatory manner.

Public Notice, DA 99-2688, released November 29, 2000, CC Docket No. 95-155, Eile No. (NSD-L-00-249 ("Comments Sought on Petitions for Emergency Relief Research Toll Free Code").

TFNC also submits that SMT/DSMI's continued failure to rectify ongoing problems in its administration of the toll free number database highlights concerns presented to the Commission over two years ago in Petitions for Reconsideration of its Fourth Report and Order in CC Docket No. 95-155.² As TFNC noted in its Emergency Petition, under the Commission's current rules, subscribers whose RespOrgs are unable to reserve numbers critical to their businesses due to SMT/DSMI's negligence or willful misconduct are left without recourse since the only effective way to protect such businesses from this harm – by permitting them to retrieve numbers in a marketplace environment – is unlawful.³

The Commission's consideration of these pleadings is long overdue and would benefit greatly by a refreshed record on SMT/DSMI's management of the toll free database, and the experience of RespOrgs and toll free service providers under the Commission's number allocation and brokering rules. Accordingly, TFNC urges the Commission to issue a Public Notice to refresh the record in this docket,⁴ expedite its consideration of all pending petitions for reconsideration, and defer the release of the 855 toll free access code until such pending matters have been resolved. The public interest will not be harmed by such limited delay, since, by SMT/DSMI's own

See, e.g., Petition for Reconsideration of TLDP Communications, Inc., filed May 27, 1998; Supplemental Petition for Reconsideration of TLDP Communications, Inc., filed June 26, 1998; Joint Petition for Reconsideration of The Direct Marketing Association and the American Car Rental Association, filed May 4, 1998.

TFNC Emergency Petition, pp. 2-3.

The Commission previously refreshed the record in this docket when the record was only two years stale. See Public Notice, "Further Comments Toll Free Service Access Codes", 1997 FCC LEXIS 3503, released July 2, 1997.

records, toll free number exhaustion will not occur for 198.9 weeks, until October 1, 2004.⁵

In its Petition for Emergency Relief and Expedited Action, TFNC demonstrated how SMT/DSMI's administration of previous toll free number rollouts has been riddled with irregularities, resulting in the lockout of many Responsible Organizations ("RespOrgs") for extended periods of time. These improprieties have had a particularly adverse impact on smaller RespOrgs utilizing graphical user interfaces ("GUI") and dial-up systems to reserve numbers. By SMT/DSMI's own admission, the playing field between online/GUI users and RespOrgs utilizing mechanized generic interfaces ("MGI") has not been level historically, and MGI RespOrgs have been able to reserve numbers more rapidly, without the congestion delays and lockups experienced by online/GUI users.⁶ These problems have prevented smaller RespOrgs and toll free number subscribers from reserving numbers critical to their businesses.

In its Comments responding to TFNC's Emergency Petition, SMT/DSMI alleged that its most recent number rollout, for the 866 code, was "relatively problem-free," and that system upgrades since the 866 rollout have eliminated prior difficulties. SMT/DSMI Comments, pp. 4, 7. As it concedes elsewhere in its pleading, however, at least 35 RespOrgs experienced system lockout problems during the 866 rollout which led SMT/DSMI to implement its self-described

See attached SMS/800 Bulletin Number SMS-00-295, dated December 11, 2000.

Comments of the SMT and DSMI on the Petitions for Emergency Relief of the Toll Free Number Coalition and the Toll Free Commerce Coalition, filed November 16, 2000 (SMT/DSMI

upgrades. *Id.* at p. 5. See also TFNC Emergency Petition, Declaration of Sandy S. Murray; Petition for Emergency Relief and Comments in Support of Petition for Emergency Relief and Expedited Action of Toll Free Commerce Coalition, filed November 13, 2000, Statement of Robert H. Tate; attached Declaration of Sandra S. Murray; attached letters of RSL COM U.S.A., Inc. and others.

Nor has SMT/DSMI offered any evidence that it has corrected the problems which have plagued its previous number rollouts. In its Comments, SMT/DSMI goes to great lengths to describe the system upgrades it has implemented, and the advance testing which it conducted, to ensure a level playing field between MGI and GUI/online users. As TFNC demonstrated in its Emergency Petition, however, RespOrgs received insufficient notification and guidance regarding SMT/DSMI's "stress test," and at no time during testing or thereafter did SMT/DSMI respond to inquiries as to how many, and what types of, users were participating in the trial. Nor has SMT/DSMI provided RespOrgs or the Commission with hard, confirmable data supporting its contention that the problems encountered in previous number rollouts have been eliminated.

Public records, moreover, contradict SMT/DSMI's claim that its 855 "stress test" replicated the congestion problems experienced in previous rollouts. SMT/DSMI Comments, p. 4. During a SNAC Conference call on 855 implementation held on November 3, 2000, records show that a question was asked as to whether "a testing scenario took place to where [sic?] the different online users

Comments), p. 3; attached June 5, 2000 letter of Ronald D. Havens to L. Charles Keller; attached Declaration of Michael J. Wade, \P 6.

requested the same 855 number at the same time." In response, "it was noted that a specific scenario was not set up for the guest testing, but this scenario has been tested internally by Telcordia and the SMS has worked properly resulting in a first-come, first served assignment." In short, it would appear that SMT/DSMI's much-heralded "stress test" did not replicate the conditions in prior number roll-outs, in which multiple RespOrgs, using different technologies (MGI, GUI, online) all competed for the same numbers simultaneously. Precisely what conditions the SMT/DSMI "stress test" did create are unknown. Moreover, to the extent Telcordia has replicated the conditions of previous roll-outs and tested them internally, neither it nor SMT/DSMI have shared such information with RespOrgs or the Commission.

SMS/800 Number Administration Committee (SNAC) Full SNAC Conference Call, Issue 1727: 855 Implementation, November 3, 2000, 1:00 p.m. EDT, Host: ATIS (emphasis added), attached hereto. In its Comments, SMT/DSMI dismisses the concerns raised by TFNC and TTFCC by asserting all RespOrgs had an opportunity to participate in conference calls to discuss "stress test" results, and that no objections to the reported results were raised. SMT/DSMI Comments, pp. 4, 6. The minutes of the November 3 conference call, however, undermine SMT/DSMI's own claims regarding the significance of its findings. SMT/DSMI also neglects to mention events following the November 3 conference call which belied SMT/DSMI's assurances that the 855 rollout would run smoothly. As the attached Declaration of Sandra S. Murray reflects, SMT/DSMI informed RespOrgs that they would receive their new software for the 855 release on November 4, and were told that the new software would not require any RespOrg programming changes. Ms. Murray's company, however, did not receive its new software until November 7, which it installed on the same day. There were numerous problems that did require programming changes; in fact, her company's MIS team had to call SMT/DSMI numerous times between November 7 and November 17 to reprogram and work through the problems. SMT/DSMI admitted that it had not checked the software and that other RespOrgs were also having problems.

WHEREFORE, the Toll Free Number Coalition respectfully urges the Commission to issue a Public Notice refreshing the record in CC Docket No. 95-155, resolve all pending petitions for reconsideration in that docket, and defer the release of the 855 toll free service code until such time as such petitions have been resolved and SMT/DSMI has demonstrated to the satisfaction of the Commission that it has adequately rectified the problems which marred its previous rollouts.

Respectfully submitted,

THE TOLL FREE NUMBER COALITION

By:

Eric Fishman

Holland & Knight, LLP

2100 Pennsylvania Avenue, NW

4th Floor

Washington, DC 20037

Phone: (202) 828-1849 FAX: (202) 828-1868

e-mail: efishman@hklaw.com

December 13, 2000

DECLARATION OF

SANDRA S. MURRAY

- 1. I am Sandra S. Murray, President of TLDP Communications, Inc., General Partner of The Long Distance Partnership, L.P., in Burlington, Vermont.
- 2. The Long Distance Partnership is a RespOrg (ID No. LPS01). The Partnership is also a switchless reseller, providing 1+, toll free and calling card services to its customers. The Partnership markets its services through a variety of channels, including affinity marketing through non-profit institutions and shared use 800 services marketed by direct mail and business-to-business teleselling.
- 3. The Long Distance Partnership has participated in 3 tests of the SMS800GUI site during a period of September 6, 2000 through October 17, 2000.
- 4. While working with the SMS800 group during this period to correct the various problems experienced during the July 29, 2000 release of the 866 NAC, and in preparation for the release of 855, LDP repeatedly encountered software and firewall problems. The attached Schedule A is a chronicle of our MIS department's discussions with SMS during the testing period.
- 5. On July 20, 2000, only minutes prior to the activation of the 866 NAC in the SMS, several of our computers were disconnected from the system by the SMS, despite assurances received from the SMS staff, prior to the release, that no one would be disconnected during this period. To date, the SMS staff has not been able to explain why our computers were disconnected from the system immediately prior to the 866 release, disadvantaging us in the reservation process. One of our objectives for the period prior to the 855 release has been to ensure that this problem would not re-occur.
- 6. DSMI has not demonstrated that the number of RespOrgs that participated in the September 6, or October 10 and 12 tests were adequate enough to duplicate the same traffic conditions and system failure errors that occurred on July 29, 2000. The referenced other tests were structured around SMS800GUI users. But to fully test the changes made to the system, in an effort to duplicate the system failures experienced with the 866 release on July 29, industry-wide participation would be required, and not just the involvement of the RespOrgs who reported problems.
- 7. It should also be noted that, following the November 3 conference call, DSMI advised RespOrgs that they would receive their new software for the 855

release on November 4, and were told that the new software would not require any RespOrg programming changes. We, however, did not receive our new software until November 7, which we installed on the same day. There were numerous problems that did require programming changes; in fact, our MIS team had to call SMT/DSMI numerous times between November 7 and November 17 to reprogram and work through the problems. SMT/DSMI admitted that it had not checked the software and that other RespOrgs were also having problems.

I hereby declare, under penalty of perjury, that I have reviewed the attached Comments of the Toll Free Number Coalition, and that the statements therein, and in this Declaration, are true and correct.

Executed:

December 13, 2000

Sandra S. Murta

President

13:48

12/13/2000

SMS/800

Clied 5 work fore

Bulletin Number:

SMS-00-295

Date:

11-Dec-00

Subject:

Number Administration Summary Reports for Saturday, 12/9/2000 as of 11:59 PM, Eastern Time

	STATUS										
	WORKING	ASSIGNED	RESERVED	DISCONNECT	TRANSIT	UNAVAIL	SUSPEND	TOTAL NUMBERS IN USE	PERCENT IN USE	SPARE	TOTAL POOL (In Use + Spare)
NPA: 800	7,561,641	26,104	21,994	49,694	38,734	1,488	160	7,699,815	99.87%	10,185	7,710,000
NPA: 866	1,235,816	11,914	94,441	28,324	6,234	1,500	20	1,378,249	17.27%	6,601,751	7,980,000
NPA: 877	6,374,659	15,191	41,505	299,949	369,826	1,492	32	7,102,654	89.01%	877,346	7,980,000
NPA: 688	7,789,583	14,212	24,075	63,456	76,595	1,500	35	7,969,456	99.87%	10,544	7,980,000
TOTAL:	22,961,699	67,421	182,015	441,423	491,389	5,980	247	24,150,174	76.30%	7,499,826	31,650,000

CLOSED 800-NXX'S:

ALL 0XX AND 1XX CODES (000-199)

202; 212; 271; 302; 312; 389; 402; 412; 415; 502; 512; 534; 602; 612, 623; 702; 703; 712; 740; 744; 751; 802; 812; 855; 902; 904; 907; 911; 912

CLOSED 866-NXX'S:

ALL 0XX AND 1XX CODES (000-199)

555; 911

CLOSED 877-NXX'S:

ALL 0XX AND 1XX CODES (000-199)

555; 911

CLOSED 888-NXX'S:

ALL DXX AND 1XX CODES (000-199)

555; 911

\$1/S/800 Help Desk 1721 S. Syres Skeet Bismarck, NO 58504 (583) SMS-3300, Option 1

SIVIS/800

Bulletin Number:

SMS-00-295

Page 2

Date: Subject: 11-Dec-00

Number Administration Summary Reports for Salurday, 12/9/2000 as of 11:59 PM, Eastern Time

WEEK ENDING DATE	TOTAL NUMBERS IN USE	SPARE	GROWTHWEEK	NUMBERS RESERVED DURING WEEK	NUMBERS SPARED FROM DISCONNECT	NUMBERS SPARED FROM RESERVED	NUMBERS SPARED FROM UNAVAILABLE	DURING WEEK
11/18/00	24,065,159	7,584,841	65,816	133,281	30,597	36,868	0	67,465
11/25/00	24,068,533	7,581,467	3,374	72,988	32,815	36,799	(69,614
12/2/00	24,100,463	7,549,537	31,930	137,912	76,539	29,443	3	0 105,982
12/9/00	24,150,174	7,499,826	49,711 .	104,98	36,16	19,10	9	0 55,273

(A) Total Spare Numbers (12/9/2000)

7,499,826

(B) Average Growth/Week (over the last 4 weeks):

37,708

(C) A÷B

198.9 Weeks (Up to 10/1/2004)

SMS1600 Help Desk 1721 S. Sykes Sveet Bismarck, NO 58504 (888) SIMS 3300, Ciption 1

LONG DISTANCE PARTNERSHIP, L.P. MEMORANDUM

TO:

SM

FROM:

SLP

DATE:

December 6, 2000

RE:

Notes of conversations with SMS

Contact notes for MIS with SMS regarding testing and software issues:

Please note that these are some of our notes regarding conversations with SMS. There are others that we did not document or cannot find the documentation.

9/1/00 17:38 Rec'd letter from Karla Duray re: instructions for 9/6/00 Stress Test.

On or around 9/4/00 KPM, MR and I participated in a conference call with a person from SMS 800 Group regarding the 866 release the problems we encountered. We asked if they would have enough participation to duplicate the error. Technician had no info for us. Did not know who was going to participate. Did not now how many participated on 7/29/00 866 release. Did not know what the problem was on 7/29/00. Was going to try to get some answers and call us back. Also was going to forward info on stress test.

Prior to 9/6/00 we were using VPN version SR-4005-95.

9/6/00 07:46 Sent Email to Karla Duray asking if there will be a conference call to monitor the stress test.

9/6/00 09:42 Rec'd Email from Karla saying there will not be a conference call and asks that I return the questionnaire to them after the test.

9/6/00 12:02 Spoke with Brooke of the help desk to verify logins were okay and ask for any instructions & documentation.

9/6/00 12:40 Spoke with Mike. Installed new software and still no login, PIN reset

9/6/00 12:47 LM with security to call me back regarding status.

9/6/00 13:00 Spoke with Jay, restest, still not working, left message for Jim in Security

9/6/00 13:05 Jim called and verified that I was not in the firewall in Dallas. PIN reset. Login/password reinstalled.

9/6/00 13:15 Logged onto test site. Performed number searches. Experienced no hang time.

9/12/00 8:21 Successfully Email stress test results to SMS. Explained problems.

9/28/00 13:08 Rec'd Email from Karla Duray inviting us to participate on a conference call 10/4/00 to discuss the 9/6/00 stress test.

10/3/00 17:16 Rec'd Email with Results of the 9/6/00 Stress test from Karla Duray. SMS claims that they only asked the RespOrgs that experienced problems during the 866 release to participate in the 9/6/00 test. They also said that the test appeared to recreate the problem. We did not experience any delays or jams.

10/4/00 15:00 Conference call regarding the 9/6/00 stress test. Verified that they did not duplicate the jam and would need to do further testing. Schedule for 10/12 and 10/17.

10/10/00 13:10 Sent Email to Karla Duray asking for instructions and info for the 10/12 and 10/17 stress tests.

10/10/00 14:15 Rec'd Email from Karla Duray indicated that CSB-00-199 was sent to us on Sept. 15. I did not get a copy.

10/11/00 12:05 Rec'd Email from Brooke with 866 Instructions for stress test.

10/11/00 16:35 Spoke with Dan Yanez at option 2 regarding logins unsuccessful

10/11/00 17:30 Darvin left message with security regarding logins

10/12/00 8:00 Spoke with Margarite re: login trouble. She will check with Darla.

10/12/00 9:26 Spoke with Derek, told him problem he said he would look into it or have someone call me back.

10/12/00 10:15 Spoke with Mike (314-331-1366) regarding logins and was told to download VPN-1-Download-DES 95/98 (4153) [SR_Win9X_Strong].

10/12/00 13:15 Connected and tested IMSE01@ wwt.sms800gui.com for about 15+minutes. Response time was good. Confirmation was sporadic.

10/17/00 10:33 Sent Email to sms800hd verifying that logins and passwords are in effect for afternoon's stress test.

10/17/00 11:50 Rec'd confirmation from Karla Duray that logins should be fine. Suggested I test site before test time and contact Security at option 2 if I encounter any problems.

10/17/00 15:01 Logged into test site. Tested for 20+ minutes. Timed the responses from SMS. 5-7 second confirmation that numbers are waiting in the queue. The actual confirmations were sporadic.

10/25/00 13:00 Conference call. Non-objective. Talked about new interface dealing with first in and first out.

11/7/00 PM Rec'd package from SMS800 re: SMS Release 11.2 and upgrades. Contacted SMS who indicated that this is the latest and greatest version of VPN and we should probably install to eliminate any problems and to make things more efficient.

11/7/00 Installed new VPN software from SMS CD (SR_4165_windows9x_STR. Did not work. Tried reconfiguring settings.

Week of 11/7-11/10 Spoke with someone at SMS800 who indicated they did not test the CD's and other(s) have had problems with new software too. Dan Yenez suggested I download STRONG version from Checkpoint (4153).

Downloaded SR_WIN9X_4153_DES from checkpoint. Changes with network configurations. Couple hours and phone calls with SMS 800 before we figured out we needed to re-bind the adapters and reset configurations.

11/12/00 No answer received from firewall. Could not get new key/PIN.

Week of 11/13/00 installed new VPN software on 9 PC's.

11/15/00 Contacted Brook at SMS who Emailed me firewall/network instructions.

Didn't get reconfigured or bound until 11/15 and 11/16. We were all set and ready to go 11/17/00 after a lot of effort. A lot of "no-answer received from firewall" errors 11/15-11/17.

11/17/00 Only issue 11/17/00 was one of our cards needed PIN reset (LPS01HMW), fixed in the morning. All set!

SMS/800 NUMBER ADMINISTRATION COMMITTEE (SNAC)

Full SNAC Conference Call Issue 1727: 855 Implementation November 3, 2000 1:00 p.m. EDT Host: ATIS

I. WELCOME/CALL TO ORDER

Leslee Strohm, SNAC Co-Leader, welcomed the participants and called the meeting to order. The participants introduced themselves. A list of participants is attached to the meeting record. (*Attachment 1*)

II. AGENDA

The purpose of this call was to discuss the Go/No-Go for 855 ERC (Easily Recognized Code) based on the first-come, first-served functionality.

III. DISCUSSION

Points Noted:

- 1. It was noted that guest testing for 855 ERCs in the SMS took place on October 17, 2000. It was noted that the majority of the RespOrgs participated in the testing on October 17 and did not encounter any difficulties regarding the first-come, first-served functionality.
- 2. A question was asked if the SMT validated that the first-come, first-served functionality was working properly. It was noted, that during guest testing of 866 ERC, number reservation requests were not queued on a first-come, first-served basis and that the three interfaces (GUI, Online and MGI) received different priorities in their requests. In response it was noted that for the code opening of 866 ERC, three different transaction codes were assigned, one for each interface. It was further noted that the problem has now been resolved to guarantee a first-come, first-served for number requests by only using one transaction code for all requests. With the new SMS upgrade, requests received are now queued and processed in such a manner that first-come, first-served is guaranteed.
- 3. A question was asked if a testing scenario took place to where the different online users requested the same 855 number at the same time. In response it was noted that a specific scenario was not set up for the guest testing, but this scenario has been tested internally by Telcordia and the SMS has worked properly resulting in a first-come, first-served assignment.
- 4. It was suggested that, based on the information provided by the SMT as stated above, the SNAC should reach consensus on the "Go" for the 855 code opening.

Agreement Reached:

1. The SNAC agreed to move forward with the 855 code opening on November 18, 2000, 12:01 p.m. CST, based on the information received by the SMT that the functionality first-come, first-served is working properly.

Points Noted:

- 5. A participant asked if a bridge has yet been provided for the code opening date of November 18, 2000. No bridge has been provided.
- 6. It was suggested to have an SMT representative on the conference bridge during the code opening, who can address any questions or problems from the RespOrgs and also give the "go-ahead" for the code opening at 12:01 p.m. CST. In response the SMT noted that a vendor would be on the conference call bridge on November 18.

Action Items:

- 1. Jonnie Bond, AT&T, will provide to Heike Martin, ATIS, the bridge for the code opening. The bridge will be available starting at 11:40 a.m. CST.
- 2. Heike will post the information for the code opening to the ATIS calendar page and send an exploder notice to the SNAC.

IV. ADJOURN

Leslee thanked the attendees for their participation. The meeting was adjourned at 1:25 pm.

Submitted by
Heike Martin
ATIS
Committee Administrator

List of Participants:

(Attachment 1)

Jonnie Bond, AT&T

Judy Cook, Sprint

Mary Stapney, Sprint

Anne Griffith, Sprint

Carol Ryan, Bell Canada

Karen Colady, AT&T Canada

Robert St. Louis, AT&T Canada

Joe Rubio, WorldCom

Lauren Mason, SBC

Ellen Oteo, SMT Representative

Sandra Murray, 800 Response

Leslee Strohm, Qwest

Howard Grove, Verizon

Don McManus, Verizon

Judith Oppenheimer, ICB

Debra Jones, Pacific Bell

Vasantha Ananthakrishnan, Telcordia Technologies

Anil Patel, DSMI

Mike Wade, DSMI

Ted Fernandez, SMT Representative

Ron Pollard, SWB Data Center

Kris Vollmer, SMS/800 HelpDesk

Mike Nichols, ATIS

Deseree Herring, ATIS

Heike Martin, ATIS



Business Markets Division, RSL COM U.S.A., Inc.

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

> Re: Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other

P.O. Box 155 Pittsburgh, PA 15230



Business Markets Division, RSL COM U.S.A., Inc.

reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toil free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: WST01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Levella

Sincerely,

Marcy Lavella

cc: Bennet & Bennet

TTFCC

P.O. Box 155 Pittsburgh, PA 15230

IOWA TELECOMMUNICATIONS & TECHNOLOGY COMMISSION

THOMAS J. VELSACK
GOVERNOR

SALLY J. PEDERSON Lt. GOVERNOR Buthy Heardsgard, Charperson Richard D. Johnson Timothy L. Ladonte Mary A. Nelson Richard H. Ome Mark J. Reikuten



IOWA COMMUNICATIONS NETWORK PO BOX 587 JOHNSTON, IA 50131-0587

Ms. Porothy Attwood, Chief Common Carrier Buleau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

195

Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTPCC") and the Toll Free Number Coalition ("TTPCC") in their efforts to ensure that all future releases of toll free service access codes, including \$55, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTPCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority/866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the interdinate preference given to MGI equipped Responsible Organizations

INTEGRATING TECHNOLOGIES TO ENHANCE IOWA'S QUALITY OF LIFE Phone: (515) 725-10WA (4692) or 1-800-645-8860 Fax: (515) 725-4751 Email: info@filen.idate.le.us

Received Dec-12-00 02:55pm

From-202 371 1558

To-HOLLAND & KNIGHT LLP

Page 04

12.08.2000 11:34

reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional tell free access codes including 855. We are a Responsible Organization (Resp Org II): **Low!**) authorized by DSMI to reserve tell free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely

CC;

Bonnet & Bennet TTFCC

きまる何てロネギュ



Common Carrier Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including \$55, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMSS00 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of coll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SM\$800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: IVN01) authorized by DSMI to reserve tall free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely,

Janis Hayer Telco Manager XO Communications

ce: Bennet & Bonnet

TTFCC

BUS. (970) 226-2999 • FAX (970) 226-4569 • 1-800-754-1001 SCOTCH PINES VILLAGE OFFICES • 2601 S. LEMAY • SUITE 36 • FT. COLLINS, CO 80525

Ms. Derothy Attwood, Chief Common Car ier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Fair and Equitable Distribution of Toll Free Numbers
Support for The Foll Free Commerce Coalition
Ex Parte Communication
CC Docket No. 35-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coa ition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, and conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the dissues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management. Inc. ("DSMI"), releases tell free numbers in new service access codes.

We believe it is inequirable that the SMS800 toll free number administration system provides MCI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the mast highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system transchargely following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system transcessed all importative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highert priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI entraged Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI ferreach of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation scrivity on July 29, 2000 should also include the number of reservation requests

Telecan filates Inc.

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submitted for the same 866 numbers by different Responsible Organizations; this information should help il usuate the inordifice demand for certain numbers and should help demonstrate that MCI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers are

We'er courage the Continues in to resolve these pending issues prior to authorizing the release of any additional toll fire access codes including 855. We are a Responsible Organization (Resp Org ID: TSHO) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincere 3

Shawnee Em ney

Corporate Acministrator

CC:

Benn n & Bennet TIFCC

Job 373

ABCO Communications, Inc.

1135 South A Street Santa Rosa, CA 95404-5407 707-591-0151 RESP ORD ID# ABCOL

December 7, 2000

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Fair and Equitable Distribution of Toll Free Numbers
Support for The Toll Free Commerce Coalition
Ex Parte Communication
CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests.

Job 373

The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: _____) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely

Robert M. Zoglin

President

cc: Bennet & Bennet

TTFCC



December 7, 2000

Ms. Dorothy Attwood, Chief Common Carrier Bureau Fecleral Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Deer Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emargency Relief" filed on November 13, 2000 and the issues relating to the policies and procedures by which the Commission, through its designated administrator. Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free access codes. On July 29, 2000, during the release of toll free access code 666 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 868. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by D8MI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toil free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toil free access codes including 855. We are a Responsible Organization (Resp Org ID; 9TM01)

authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this

proceeding.

Sincerely,

Janis L. Farrell

Manager, Number Portability Services

BTI

cc: Elennet & Bennet

4300 Six Porks Road ◆ Raleigh, NC 27609 ♦ (919) 863-7000 ♦ (800) 249-9100 ♦ Fax (919) 863-7319



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Ms. Donothy Anwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Artwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relicf" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relicf" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the mordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: IXC01, DBC01, CXT01, DCT01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

OMMunications

Sincerely,

Quaster InfoComm, Inc. 180 East 100 South

Selt Lake City, UT 84145-0433

PO Rox 45433

QUESTAR

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re

Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including \$55, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: QST01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely.

Karen S. Spencer

St. Communications Engineer

faren S. Spance

Questar InfoComm, Inc.

11 East 700 South Salt Lake City, UT 84111

Phone: (801) 324-1924 Fax: (801) 324-1959

Email: KarenS@questar.com

cc.

Bennet & Bennet

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Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TTNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high sctivity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 855. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: SEM01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the ourcome of this proceeding.

Sincerely,

Andy Kaps Vice President

oo: Bennet & Bennet TTFCC



Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Polition for Emergency Rollof" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should

6801 N. CAPITAL OF TEXAS HWY. BLDG. 2, SUITE 100 AUSTIN, TX 7873 (512,561.8) 11 512,581,6110 FAX WWW.PDINI-ONE.NET



illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: PVT01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincorchy,

Danny Davis

800 Database Programmer
PointOne Telecommunications
ddavis@pointone.com

CC:

Bennet & Bennet
TIFCC

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December 7, 2000

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

Fair and Equitable Distribution of Toll Free Numbers
Support for The Toll Free Commerce Coalition
Ex Parte Communication
CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") In their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the Issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending Issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's Investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The



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Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: HAPO1) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely,

JACQMETTA PEACE

cc: Bennet & Bennet TTFCC

Toll Free Numbers: (888) REWIREIT (888) 739-4734 ***FAX (800) 725-6670

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3925 N. 1-10 SERVICE RD. WEST 8UITE 223 METAIRIE, LOUISIANA 70002-8658



11500 NORTHWEST PREEWAY SUITE 170 HOUSTON, TEXAS 77092-0519

Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition

Ex Parte Communication CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filled on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filled on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 866 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866.

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11500 NORTHWEST FREEWAY SUITE 170 NOUSTON, TEXAS 77092-6519

This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID: BYS01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sincerely,

George T Woodgate

ec:

Bonnet & Bonnet

TIFCC

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Ms. Doruthy Artwood, Chief Common Carrier Burean Pederal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Pair and Equitable Distribution of Toll Free Numbers
Support for The Toll Free Commerce Coalition
Ex Parte Communication
CC Docket No. 95-155

Dear Ms. Attwood:

We hereby support The Toll Prec Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efforts to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Communication ("FCC" or "Commission"). We snoomage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator. Dambase Service Management, Inc. ("DSMI"), releases toll free numbers in new service access codes.

We believe it is inequitable that the SMS800 toll free number administration system provides MGI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly cought after toll free numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was assentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 266 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI

we request that the Commission commet an investigation of the number reservation advantage provided to McI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This data should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation scrivity on July 29, 2000 should also include the number of reservation requests submitted for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 355. We are a Responsible Organization (Resp Org ID: RAC01) authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sinceroly, Szeve Kovvalski

Resporg Administrato

cc: Benner & Bennet

TTFCC

TO-HOLLAND & KNIGHT LLP Page 002



Ms. Dorothy Attwood, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re Fair and Equitable Distribution of Toll Free Numbers Support for The Toll Free Commerce Coalition Ex Parts Communication CC Docker No. 95-155

December 12, 2000

Dest Ms. Arwood:

We hereby support The Toll Free Commerce Coalition ("TTFCC") and the Toll Free Number Coalition ("TFNC") in their efform to ensure that all future releases of toll free service access codes, including 855, are conducted in a fair and equitable manner as mandated by the Federal Communications Commission ("FCC" or "Commission"). We encourage the Commission to remedy the issues raised by TTFCC in its "Petition for Emergency Relief" filed on November 13, 2000 and the issues raised by TFNC in its "Petition for Emergency Relief" filed on November 9, 2000, as well as other pending issues relating to the policies and procedures by which the Commission, through its designated administrator, Database Service Management, Inc. ("DSMI"), releases toll free numbers in new service access

We believe it is inequitable that the SMS800 toll free number administration system provides MOI equipped Responsible Organizations an advantage over all other Responsible Organizations in reserving the most highly sought after toll five numbers. The advantage given MGI equipped Responsible Organizations is manifested only during the high activity demand placed on the SMS800 system immediately following the release of new toll free service access codes. On July 29, 2000, during the release of toll free access code 866 our non-MGI electronic access to the SMS800 system was essentially inoperative for substantial periods during at least the first 20 minutes immediately following the release of 866. During the periods when the SMS800 system was non-responsive, we were unable to submit reservation requests for toll free 366 numbers. When the SMS800 system did respond to our reservation requests many if not all of our highest priority 866 numbers were already reserved.

We request that the Commission conduct an investigation of the number reservation advantage provided to MGI equipped Responsible Organizations by the SMS800 system. We request that the Commission's investigation include an accounting of the number of reservation requests processed by DSMI for each of the approximately 250 Responsible Organizations during each of the first 60 critical minutes following the release of 866. This date should illustrate the inordinate preference given to MGI equipped Responsible Organizations reservation requests over all other reservation requests. The accounting of 866 number reservation activity on July 29, 2000 should also include the number of reservation requests adminized for the same 866 numbers by different Responsible Organizations; this information should help illustrate the inordinate demand for certain numbers and should help demonstrate that MGI Responsible Organizations are able to reserve an overwhelming portion of these most highly prized toll free numbers.

We encourage the Commission to resolve these pending issues prior to authorizing the release of any additional toll free access codes including 855. We are a Responsible Organization (Resp Org ID:

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To-HOLLAND & KNICHT LLP Page QOS

authorized by DSMI to reserve toll free numbers and therefore we have a vested interest in the outcome of this proceeding.

Sinceraly,

Jesse McPherson
International Teleom, LTD.

206.479.2322 (phone) 206.479.4429 (fax)

http://www.jthd.nci

cc: Bennet & Bennet

TTFCC

TOTAL P.03

Leslie J. Selzer Network Services Division Common Carrier Bureau Federal Communications Commission

Louise L. M. Tucker Senior Counsel-Washington Database Service Management, Inc. 2020 K Street, NW, Suite 400 Washington, DC 20006

Brent Weingardt Bennet & Bennet, PLLC 1000 Vermont Avenue, NW 10th Floor Washington, DC 20005

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Eric Fishman

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L. Charles Keller, Chief Network Services Division Common Carrier Bureau Federal Communications Commission

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CERTIFICATE OF SERVICE

I, Eric Fishman, hereby certify that on December 13, 2000, copies of the attached Comments of Toll Free Number Coalition were hand-delivered to the following persons at the addresses below unless otherwise indicated.

Magalie Roman Salas, Secretary Federal Communications Commission 445 12th Street, SW, Room TW-A325 Washington, DC 20554

Hon. Gloria Tristani. Commissioner Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Hon. Harold Furchtgott-Roth, Commissioner Dorothy Attwood, Chief Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Hon. William E. Kennard, Chairman Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Yog R. Varma Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Hon. Susan Ness, Commissioner Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Martin Schwimmer, Network Services Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Hon. Michael K. Powell Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Diane Griffin Harmon, Deputy Chief **Network Services Division** Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Washington, DC 20554